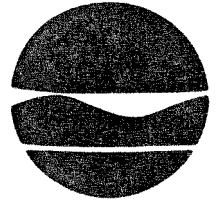


New York State Department of Environmental Conservation  
600 Delaware Avenue, Buffalo, New York 14202

RECEIVED

DEC 13 1988



Thomas C. Jorling  
Commissioner

COE KC DIST  
SUPERFUND BRANCH

December 9, 1988

Mr. Lee Fuerst  
700 Federal Building  
601 East 12th Street  
Kansas City, Missouri 64106-2896

Attn: CEMRK-ED-TD/Mr. Fuerst

Dear Mr. Fuerst:

We have reviewed the report entitled, "RI/FS Former Lake Ontario Ordnance Works, Lewiston/Porter, Niagara County, N.Y." dated Nov. 1988, and offer you the following comments:

Although further investigation of certain areas is recommended, no attempt has been made to define the site specific compounds list to be used for soil/sediment and groundwater investigation.

Furthermore, minimum action levels of these compounds that might be present in the investigated media should be defined so that additional work can proceed without delay.

#### Specific Comments

##### Area A

- 1) It is clear that the presence of buried drums has resulted in soil and groundwater contamination in the vicinity of the drums. Fortunately, the groundwater samples from monitoring wells which were installed 300 feet to the northwest of the buried drums do not appear to have been impacted by migration of the contaminants. However, it should be noted that the rate of groundwater migration through the upper glacial tills is on the order of 0.1 ft./yr. Therefore, contamination should not yet have migrated to wells MW-A-1s and NW-A-1d. Additional wells which are located closer to the contaminant source are needed to determine the extent of groundwater contamination in the vicinity of the buried drums.

#### Area B

- 1) As is the case for Area A, additional wells are needed to determine the extent of contamination in the vicinity of the buried drums.
- 2) The March, 1988 "Interim Report on Well MW7-3S Invest: Model City TSD Facility, Model City, New York" which was submitted to the NYSDEC by CWM Chemical Services, concludes that the contamination found in Well MW7-3S and soil samples to the north and west of that well is "...associated with the Olin Burn Area...".

That conclusion appears to conflict with the conclusion on page 10-2 of the Acres report which states "These contaminants cannot be directly related to the previous burn pit activities and possibly are a result of another onsite source". This apparent conflict needs to be resolved through further investigation.

The NYSDEC does not consider the list of "potentially present" compounds set forth in Table 4-8 to be inclusive of all the compounds which may be associated with past government activities at the site. For example, acetone does not appear on the list in Table 4-8, yet acetone was the "primary compound" observed in the volatile fraction of the six drums which were tested in area A.

#### Area C & Area North of C

- 1) The groundwater elevation observed in well MW-C-3S, 300.43 ft. is inconsistent with the historical groundwater elevation data base from CWM wells in the vicinity of MW-C-3S.
- 2) The Acres report concludes that there is "...no evidence of buried drums or associated contaminated conditions that would warrant further investigation". The data presented in the January, 1988 "Interim Report, P-12-2S Investigation, SLF 12 Area, Model City Facility" prepared by Golder Associates for CWM Chemical Waste Management suggests that the source of the soil and groundwater contamination found along and to the east of Access RD. #2 may be in Area C.

That contamination, of which the primary constituents are carbon tetrachloride and chloroform, may be related to past DOD activities. Further identification of the probable source and extent of the contaminants is needed.

#### Acid and TNT Wastelines

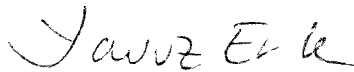
- 1) Additional investigation is needed to identify the environmental impacts of these lines. It is suggested that the contractor seek the assistance of CWM to identify areas where the lines are likely to be present. In addition, the use of geophysical techniques to locate the lines should also be considered.

Additional Areas of Possible Contamination

Section 4.2 describes "Several other areas which could potentially be contaminated with hazardous wastes". However, the RI/FS report does not contain any recommendations for the investigation of the areas identified in Section 4.2. It is the NYSDEC position that additional investigation and, possibly, remediation are needed at those areas. The DOD has a responsibility to initiate an RI/FS program to address the environmental impacts associated with past government activities in those areas.

Should you have any questions on these matters, please call me at 716-847-4585.

Sincerely,

A handwritten signature in cursive script, appearing to read "Yavuz Erk".

Yavuz Erk, P.E.  
Senior Sanitary Engineer

cc: Mr. Christopher Allen  
Mr. Edward Miles  
NCHD  
Mr. Edward Belmore

YE:jps